

**PAUL**  
**HASTINGS**

SO ORDERED.



LEWIS J. LIMAN  
United States District Judge

December 17, 2021

VIA ECF

The Honorable Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 701  
New York, NY 10007

12/17/2021

Re: *EVRYTHNG Limited v. Avery Dennison Retail Information Services, LLC, et al.*, Case No. 21-cv-4411-LDL (S.D.N.Y.)  
Plaintiff's Letter-Motion to File Documents with Permitted Redactions

Dear Judge Liman,

This firm represents Plaintiff, EVRYTHNG Limited (“EVRYTHNG”) in the above-referenced case. Pursuant to Fed. R. Civ. P. 26(c), the Protective Order governing this case (Dkt. No. 37), and Your Honor’s Individual Practices in Civil Cases § 2.G, EVRYTHNG respectfully requests the Court’s permission to refile the following unredacted documents under seal, while filing public versions in redacted form with permitted redactions as approved by the Order at Dkt. No. 167:

- (1) Plaintiff's Memorandum of Law, originally filed at Dkt. Nos. 6 & 7
- (2) Declaration of Niall Murphy, originally filed at Dkt. Nos. 9 & 10
- (3) Exhibit B to the Declaration of Niall Murphy, originally filed at Dkt. Nos. 9 & 10
- (4) Exhibit C to the Declaration of Niall Murphy, originally filed at Dkt. Nos. 9 & 10
- (5) Exhibit D to the Declaration of Niall Murphy, originally filed at Dkt. Nos. 9 & 10
- (6) Declaration of Lucy Oulton, originally filed at Dkt. Nos. 11 & 12
- (7) Exhibit H to the Declaration of Lucy Oulton, originally filed at Dkt. Nos. 11 & 12
- (8) Exhibit I to the Declaration of Lucy Oulton, originally filed at Dkt. Nos. 11 & 12
- (9) Exhibit J to the Declaration of Lucy Oulton, originally filed at Dkt. Nos. 11 & 12
- (10) Exhibit K to the Declaration of Lucy Oulton, originally filed at Dkt. Nos. 11 & 12
- (11) Exhibit U to the Declaration of Lucy Oulton, originally filed at Dkt. Nos. 11 & 12
- (12) Declaration of Keith Turco, originally filed at Dkt. Nos. 13 & 14

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- (13) Plaintiff's Memorandum of Law, originally filed at Dkt. Nos. 42 & 43
- (14) Declaration of Niall Murphy, originally filed at Dkt. Nos. 44 & 45
- (15) Exhibit B to the Declaration of Niall Murphy, originally filed at Dkt. Nos. 44 & 45
- (16) Exhibit C to the Declaration of Niall Murphy, originally filed at Dkt. Nos. 44 & 45
- (17) Exhibit D to the Declaration of Niall Murphy, originally filed at Dkt. Nos. 44 & 45
- (18) Exhibit H to the Declaration of Niall Murphy, originally filed at Dkt. Nos. 44 & 45
- (19) Exhibit I to the Declaration of Niall Murphy, originally filed at Dkt. Nos. 44 & 45
- (20) Exhibit K to the Declaration of Niall Murphy, originally filed at Dkt. Nos. 44 & 45
- (21) Declaration of Lucy Oulton, originally filed at Dkt. Nos. 46 & 47
- (22) Exhibit BB to the Declaration of Lucy Oulton, originally filed at Dkt. Nos. 46 & 47
- (23) Declaration of Keith Turco, originally filed at Dkt. Nos. 48 & 49
- (24) Plaintiff's Reply Memorandum of Law, originally filed at Dkt. Nos. 75 & 76

As the Court previously approved the redactions of the above Plaintiff's filings (Order at Dkt. No. 167), EVRYTHNG respectfully requests the Court's approval to file these documents with redactions to protect the sensitive business information therein.

Respectfully submitted,

*/s/ Jeff A. Pade*

Jeff A. Pade  
of PAUL HASTINGS LLP